

June 17, 2022

To Whom it may concern,

Craft Charter, LLC. 6TXA777N, is seeking temporary exemption from 14 CFR §135.152(j) - Flight Data Recorders. We are requesting exemption for the installation of the 88 parameter FDR requirement for aircraft manufactured after August 19, 2002. This exemption would apply to a single aircraft, Gulfstream G550 SN 5265 N247EM (soon to be N550BP).

This aircraft is currently undergoing maintenance at the Savannah Gulfstream Facility and will be departing under Part 91 rules on July 14th. Gulfstream has an option to incorporate the 88 parameter FDR reporting channels under ASC-002D. During induction, we had originally scheduled this ASC to be complied with, but were informed that we would have to wait a few months to have the parts available for installation. Since the initial induction, Gulfstream issued an operator wide suspension for application of this ASC due to the inability to source components needed to install and rework the control systems for full reporting capabilities. There is no operating timeline with which to have this accomplished by the OEM. Craft Charter has exhausted all options in attempt to ensure compliance. We have sourced salvage aircraft with the hopes that the units would be available, and nothing has proved fruitful. We are at an impasse with the OEM and our ability to add this aircraft to our certificate. We are fully committed to accomplishing this upgrade once the material becomes available, but as that date is unknown, we are requesting an exemption for a period of up to 24 months.

Allowing a temporary exemption would allow Craft Charter and other similar certificate holders the ability to continue operations, grow their businesses and provide for their employees and clients. Craft Charter, and other certificate holders provide a vital service to their clients that require on demand transportation at a moment's notice.

Craft Charter does recognize the importance of the FDR system and that it is a safety device, however we do not feel that this would impact the safety of flight operations in any way. The FDR is a data collection tool, unfortunately mostly utilized in the investigation of incidents both in air, and on the ground. The lack of 31 extra parameters of data collection only assists the investigation by providing a more accurate look at the events leading up to and surrounding an incident. This is purely for data collection purposes and has no bearing on reporting to ATC, dispatchers or even the pilots as these are all discreet functions. The aircraft is compliant with 14 CFR §135.152(i) and currently reports on 57 parameters which is deemed adequate for operators with aging fleets due to the technical and cost limitations required to upgrade the platforms. We have noted a few other exemptions of the same 14 CFR part and would like to add those for consideration of our application (see attached exemption 11149, 11164).

In Summary, Craft Charter is requesting a temporary exemption of 14 CFR §135.152(j) due to the inability of the manufacturer to satisfy the parts and upgrade requirements to the fleet of aircraft not currently equipped with the 88 parameter FDR channels.

Thank you for your consideration,

*Aaron Esparza*

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